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Sent via E-mail to: [71818-21715075@requests.muckrock.com](mailto:71818-21715075@requests.muckrock.com)

RE: CPRA Request dated April 15, 2019

Ms. Caroline Haskins,

In response to your CPRA Request for the following:

*\* Any software and algorithms developed for the implementation of Palantir software in NCRIC activities. I'm particularly interested in any algorithms that have a public policy outcome, such as providing guidance on a policy or an assessment of an individual. More generally, I would like any software that was developed by or with, given to, used by, purchased or licensed to this agency for implementation of the above referenced program. This would include original source code, any compiled binaries (also known as executables), spreadsheets, program scripts, and other digital materials used to calculate any data in the above program. It would also include the input training data for machine learning algorithms. Collectively, these responsive materials will be referred to as "the software" in the following paragraphs.*

*\* All instructional materials, presentations and presentation materials (including recorded video and audio, PowerPoint files, prepared remarks, and slides formats), and other guidance on the use of "the software." This includes any notes taken during meetings that discussed the use of the software, any explanations (whether internally or externally generated) of how the software works, and any other document that has been used to help explain the use of "the software" to any party, including internal documentation, public relations materials, and executive summaries. This also includes any description of input and output data fields that will aid in understanding the type of information that is submitted to the software, and that is produced by the software.*

*\* A copy of any privacy impact assessments, use policies, standard operating procedures, data retention policies, legal opinions, warranties, non-disclosure agreements, contracts, liability waivers, insurance agreements, Requests for Proposals, Responses to Requests for Proposal, Memorandums of Understanding, Letters of Interest, usage policies, or informal agreements that reference "the software" or otherwise guide its use or the relationship between this agency and the provider or developer of the software.*

*\* A copy of any funding opportunity announcements, grant applications and grantor status/progress reports, reports to legislative bodies, annual reports that mention the use of the Software, as well as audit records, including but not limited to security audits of the software, misuse reports, and reports to oversight bodies.*

*\* A copy of any validation studies conducted with respect to Palantir software in NCRIC activities or with respect to any software or algorithms used in connection with Palantir software in NCRIC activities, and a copy of any records pertaining to inquiries for the need of validation studies, or discussion of potential or actual validation studies. By "validation study," I mean any study designed to assess how accurate Palantir is in predicting what it is supposed to predict, or to assess whether Palantir may err in the direction of either under- or overestimating likelihoods or predicted outcomes, or may produce any results that are biased or unexpected in any way.*

*\* For the aspects of the software that require an input, for example, to compute a value, we request a copy of the five most recent sets of data that were used for input, as well as the five most recent outputs of the software, in whatever their native format is. If these inputs or outputs include exempt information, we ask that you exempt only that information which is specifically exempted from law, and provide the other material.*

*\* Any electronic mail communications and electronic mail attachments that mentions "Palantir" or "Palantir software." Please limit the search results from January 1, 2012 to present.*

Enclosed are eight (08) separate documents that are responsive to this request.

This is a partial list of the documents to be produced as I am still reviewing e-mail correspondence. Once I have an accurate count of the remaining documents, I will advise of the charge for production.

Most Cordially,